

# Memorandum

DATE: April 8, 2015

WAP Memorandum 010

REPLY TO

ATTN OF: Robert C. Adams, WAP Manager  
Weatherization and Intergovernmental Program Office

SUBJECT: Quality Management Plan – Recordkeeping and Reporting

TO: Weatherization Assistance Program (WAP) Grantees

10 CFR 440.24 requires, among other specific recordkeeping requirements, Grantees and Subgrantees administering the Weatherization Assistance Program (WAP) keep records as the Department of Energy (DOE) deems necessary for an effective audit and performance evaluation. Based on this requirement DOE has required Grantees to keep records related to client file documentation. DOE has always accepted the ability of Grantees and Subgrantees to meet DOE's recordkeeping requirements related to client file documentation. However, in recent years there have been less clear and consistent approaches being used as evidenced by state and federal monitoring and oversight. The Quality Management Plan (QMP) working group, convened by DOE provided information in order for WAP to develop a draft framework to assist Grantees and Subgrantees in how to keep records consistently and how to provide access to the documentation supporting a weatherized unit.

Regardless of the format of records, Grantee and Subgrantee systems must demonstrate:

- Program rules are being followed (e.g., eligibility requirements are being followed).
- Appropriate cost effective measures are being installed (e.g., audit results are consistent with the work order generated and the invoice costs are consistent with those estimated in the audit).
- Health and safety issues are treated according to guidance (e.g., Certified Renovator is assigned to lead-paint jobs).
- Inspections are occurring as required (e.g., 100% of the units are inspected and the post-inspection checklist includes the inspection of the audit assessment).

By establishing consistent records, Grantees and Subgrantees can continue to execute DOE's expectation of high quality management and proper documentation of WAP resources.

The attached draft Client File Checklist identifies elements anticipated to be in a "complete" WAP client file. The specific contents and how the information is organized can still vary by Grantee. This is not intended to be a prescriptive list of forms or a mandated filing system. It is a tool to assist Grantees and Subgrantees in aligning file requirements to create a comprehensive client file that is able to adequately document how Weatherization services were provided in a specific home.

Grantees are invited to review the attached Client File Checklist and provide comments/feedback to your respective Project Officer or Holly Raveslout [holly.raveslout@ee.doe.gov](mailto:holly.raveslout@ee.doe.gov) by April 22, 2015.